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**FILED**  
DISTRICT COURT OF GUAM

APR - 6 2005 *mbe*

MARY L.M. MORAN  
CLERK OF COURT

(1)

IN THE UNITED STATES DISTRICT COURT  
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,  
Plaintiff.

vs.

JIA HE ZHENG, aka  
JEFF SHUI-WAH WONG, and  
BING JIN CHEN, aka  
TONYA WING-SEE CHIANG,  
Defendants.

) MAGISTRATE CASE NO.

**05-00006**

) **COMPLAINT**

) **USE OF ALTERED PASSPORT**  
) [18 U.S.C. § 1546]

THE UNDERSIGNED COMPLAINT CHARGES UPON INFORMATION AND BELIEF  
THAT:

On April 2, 2005, in the District of Guam, defendants JIE HE ZHENG and BING JIN  
CHEN, did unlawfully and knowingly use false Canadian Passports, by presenting said document  
to an officer of the U.S. Customs and Border Protection in an attempt to enter the United States,  
knowing said passports to be falsely made and issued, said passports being prescribed by statute  
or regulation for entry into the United States, all in violation of Title 18, United States Code,  
Section 1546.

1 COMPLAINT FURTHER STATES:

2 I, Manuel Candela, Jr., am a Special Agent, formerly with the United States Immigration  
3 and Naturalization Service, now with the United States Immigration and Customs Enforcement, a  
4 component of the Department of Homeland Security. I have been employed by these two  
5 agencies for over 19 years.

6 1. My duties include investigation of violations of Titles 8 and 18 of the United States  
7 Code as they apply to violations of immigration laws. The information contained in this affidavit  
8 is based on witness interviews and the collection of evidence conducted by the affiant. Based on  
9 my knowledge, training and experience with the Immigration and Nationality Act (I&NA), I  
10 hereby make the following affidavit relating to the above named defendants:

11 2. On April 2, 2005, a male and a female of Asian descent, and later identified as Jia He  
12 ZHENG and Bing Jin CHEN, arrived from Tokyo, Japan on the Continental Airlines Flight CO  
13 007 and presented themselves for inspection before U.S. Customs and Border Protection (CBP)  
14 officers. Both presented Canadian passports and were admitted as Canadian visitors.

15 3. On April 5, 2005, ZHENG and CHEN presented themselves at Pre-Inspection before  
16 CBP officers for the Continental Airlines Flight CO 002 to Hawaii. They presented their  
17 Canadian passports to CBP officer Scott Duenas.

18 4. ZHENG and CHEN presented CBP officer Duenas Canadian passports nos.  
19 VK032505 and VK033805, respectively, and boarding passes to Hawaii. ZHENG's passport  
20 was issued to Jeff Shui-Wah WONG, and CHEN's passport was issued to Tonya Wong-See  
21 CHIANG,. Officer Duenas referred them to secondary for further investigation because of their  
22 lack of English communication skills and their evasive answers to basic travel questions. Neither  
23 ZHENG nor CHEN had in their possession any type of Canadian identification cards in support  
24 of the documents already presented.

25 5. In secondary with the assistance of Mandarin interpreter Susan Harrell, CBP Customs  
26 Enforcement Officer (CEO) Edith Conway interviewed the CHEN who admitted traveling with  
27 the ZHENG and knowing him for the three months prior to arriving on Guam. ZHENG was

1 interviewed by CBP officer Byron Farley but was evasive in his response or offered no response  
2 at all.

3 6. ZHENG and CHEN were turned over to Special Agents Manuel Candela, Jr. and  
4 Timothy Conway for further investigation. Utilizing Interprettalk Language Services no. 294271  
5 in the Mandarin language, I advised ZHENG of his Miranda rights. The interview ended after  
6 ZHENG requested an attorney's advice before continuing further with the interview. ZHENG  
7 signed the Form I-214 (Warning as to Rights) used in the rights advisement with the name Jia He  
8 ZHENG not with the name in the Canadian passport.

9 7. CHEN was advised of her Miranda rights per Form I-214 utilizing Interprettalk no.  
10 294274 in the Mandarin language by SA Conway. CHEN waived her right to an attorney and  
11 stated that she resides in China and that her relatives made arrangements for her travel to the  
12 United States but she does not know how much her parents paid. She received her fake passport  
13 and airline tickets while on a flight from Shenyang, China to Tokyo, Japan from a Taiwanese  
14 man named HUANG. She claimed her relatives told her that she would be using a fake passport  
15 to enter the U.S. CHEN traveled with her friend Jia He ZHENG.

16 8. On April 6, 2005, CBP officer Edith Conway examined the Canadian passports  
17 presented by ZHENG (aka: WONG, Jeff Shui-Wah) and CHEN (CHIANG, Tonya Wing-See) to  
18 determined if they were altered passports. Based on her experience and training, officer Conway  
19 determined that the passports were altered by using the split biographic page technique.

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1 Based on the foregoing, I have probable cause to believe that defendants Jia He ZHENG  
2 aka: Jeff Shui-Wah WONG and Bing Jin CHEN aka: Tonya Wing-See CHIANG committed the  
3 offense of possession and using altered passports, in violation of 18 USC §1546.

4 FURTHER AFFIANT SAYETH NAUGHT.

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6   
7 MANUEL CANDELA, JR.  
8 Special Agent  
9 Immigration & Customs Enforcement

10 SUBSCRIBED AND SWORN TO before me on this 6th day of April 2005.

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13 JOAQUIN V.E. MANIBUSAN, JR.  
14 Magistrate Judge  
15 District Court of Guam  
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